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**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

LESLIE LILIEN, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

OLAPLEX HOLDINGS, INC., *et al.*,

Defendants.

Case No. 2:22-cv-08395-SVW-SK

**DECLARATION OF ANNE  
JOHNSON PALMER IN SUPPORT  
OF DEFENDANTS' OPPOSITION  
TO LEAD PLAINTIFF'S MOTION  
FOR CLASS CERTIFICATION**

Date: July 21, 2025  
Time: 1:30 p.m.  
Courtroom: 10A  
Judge: Hon. Stephen V. Wilson

1 I, Anne Johnson Palmer, hereby declare as follows:

2 1. I am admitted to practice before this Court and am a partner at the law  
3 firm of Ropes & Gray LLP, counsel of record for Defendants Olaplex Holdings, Inc.,  
4 JuE Wong, Eric Tiziani, Tiffany Walden, Christine Dagousset, Tricia Glynn, Deirdre  
5 Findlay, Janet Gurwitch, Martha Morfitt, David Mussafer, Emily White, Michael  
6 White, and Paula Zusi (collectively, “Defendants”). Unless otherwise stated, I have  
7 personal knowledge of the facts and circumstances stated below and, if called upon  
8 to testify, I could and would testify competently to the statements made herein. I  
9 make this Declaration in support of Defendants’ Opposition to Lead Plaintiff’s  
10 Motion for Class Certification (Dkt. 199) in the above-captioned matter.

11 2. Attached as Exhibit 1 is a true and correct copy of Defendants’ Expert  
12 Jack Wiener’s Report.

13 3. Attached as Exhibit 2 is a true and correct copy of a declaration executed  
14 by a Managing Director for Asset Services Product Management at The Depository  
15 Trust & Clearing Corporation, dated June 18, 2025.

16 4. Attached as Exhibit 3 is a true and correct copy of Olaplex Holdings  
17 Inc.’s Registration Statement on Form S-1, dated August 27, 2021.

18 5. Attached as Exhibit 4 is a true and correct copy of Olaplex Holdings  
19 Inc.’s Prospectus on Form 424(b)(4), dated September 29, 2021.

20 6. Attached as Exhibit 5 is a true and correct copy of Olaplex Holdings  
21 Inc.’s Registration Statement on Form S-8, dated October 4, 2021.

22 7. Attached as Exhibit 6 is a true and correct copy of the Scientific  
23 Committee on Consumer Safety Opinion on the Safety of Butylphenyl  
24 Methylpropional (p-BMHCA) in Cosmetic Products – Submission II, dated May 10,  
25 2019 (“SCCS Report”), available at the following link:  
26 [https://health.ec.europa.eu/system/files/2021-08/sccs\\_o\\_213\\_0.pdf](https://health.ec.europa.eu/system/files/2021-08/sccs_o_213_0.pdf).

27 8. Attached as Exhibit 7 is a true and correct copy of a page on the  
28 European Commission’s website, “The safety of Butylphenyl methylpropional (p-

1 BMHCA) in cosmetic products - Submission II,” dated May 10, 2019, available at  
2 the following link: [https://health.ec.europa.eu/publications/safety-butylphenyl-](https://health.ec.europa.eu/publications/safety-butylphenyl-methylpropional-p-bmhca-cosmetic-products-submission-ii_en)  
3 [methylpropional-p-bmhca-cosmetic-products-submission-ii\\_en](https://health.ec.europa.eu/publications/safety-butylphenyl-methylpropional-p-bmhca-cosmetic-products-submission-ii_en).

4 9. Attached as Exhibit 8 is a true and correct copy of the Commission  
5 Delegated Regulation (E.U.) 2020/1182 dated May 19, 2020 (“May 2020 EU  
6 Regulation”), published on August 11, 2020, available at the following link:  
7 <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32020R1182>.

8 10. Attached as Exhibit 9 is a true and correct copy of Commission  
9 Regulation (E.U.) 2021/1902 dated October 29, 2021 (the “October 2021 E.U.  
10 Regulation”), published on November 3, 2021, available at the following link:  
11 <https://eur-lex.europa.eu/eli/reg/2021/1902/oj>.

12 11. Attached as Exhibit 10 is a true and correct copy of the Obelis Group  
13 webpage titled “Lilial classified as a CMR substance,” dated September 24, 2020  
14 (“Obelis Group September 2020 Article”), available at the following link:  
15 <https://www.obelis.net/news/lilial-classified-as-a-cmr-substance/>.

16 12. Attached as Exhibit 11 is a true and correct copy of the Hong Kong  
17 Consumer Council webpage titled “55% Body Lotions for Babies and Toddlers  
18 Detected with Fragrance Allergens Inaccurate and Insufficient Labelling Information  
19 Poses Increased Risks,” dated September 15, 2021 (“Hong Kong Consumer Council  
20 September 2021 Press Release”), available at the following link:  
21 <https://www.consumer.org.hk/en/press-release/p-539-body-lotions-babies-children>.

22 13. Attached as Exhibit 12 is a true and correct copy of the  
23 COSMETICSCARE.EU article titled “Lilial and Zinc Pyrithione Banned,” dated  
24 November 4, 2021, available at the following link:  
25 <https://www.cosmeticscare.eu/en/lilial-and-zinc-pyrithione-banned/>.

1 14. Attached as Exhibit 13 is a true and correct copy of  
2 COSMESERVICE.COM article titled “EU Commission Publishes and Amendment:  
3 Regulation (E.U.) 2021/1902,” dated November 11, 2021, available at the following  
4 link: [https://cosmeservice.com/news/eu-commission-publishes-an-amendment-  
5 regulation-eu-2021-  
6 1902/#:~:text=This%20new%20amendment%2C%20the%20Regulation%20\(EU\)%  
7 202021/1902%2C,the%20CLP%20Regulation%2C%20dated%2019th%20May%2  
8 02020.&text=As%20of%201st%20of%20March%202022%2C%20cosmetics,must  
9 %20be%20not%20present%20at%20cosmetic%20products.](https://cosmeservice.com/news/eu-commission-publishes-an-amendment-regulation-eu-2021-1902/#:~:text=This%20new%20amendment%2C%20the%20Regulation%20(EU)%202021/1902%2C,the%20CLP%20Regulation%2C%20dated%2019th%20May%202020.&text=As%20of%201st%20of%20March%202022%2C%20cosmetics,must%20be%20not%20present%20at%20cosmetic%20products.)

10 15. Attached as Exhibit 14 is a true and correct copy of an archived webpage  
11 of Olaplex’s product page for No. 3 Hair Perfector dated April 15, 2021 available at  
12 the following link:  
13 [https://web.archive.org/web/20210415115020/https://olaplex.com/products/olaplex  
14 -no-3-hair-perfector.](https://web.archive.org/web/20210415115020/https://olaplex.com/products/olaplex-no-3-hair-perfector.)

15 16. Attached as Exhibit 15 is a true and correct copy of an archived webpage  
16 of Olaplex’s product page for No. 3 Hair Perfector, dated June 28, 2021, available at  
17 the following link:  
18 [https://web.archive.org/web/20210628104455/https://olaplex.com/products/olaplex  
19 -no-3-hair-perfector.](https://web.archive.org/web/20210628104455/https://olaplex.com/products/olaplex-no-3-hair-perfector.)

20 17. Attached as Exhibit 16 is a true and correct copy of a tweet and  
21 Olaplex’s response, dated February 24, 2022 and preserved via Web Preserver,  
22 available at the following link: <https://x.com/olaplex/status/1496933135488978959.>

23 18. Attached as Exhibit 17 is a true and correct copy of Olaplex’s February  
24 28, 2022 Facebook video caption, available at the following link:  
25 [https://www.facebook.com/olaplex/videos/hello-cherished-olaplex-family-we-  
26 know-you-may-have-questions-around-the-standar/7237266466314188/.](https://www.facebook.com/olaplex/videos/hello-cherished-olaplex-family-we-know-you-may-have-questions-around-the-standar/7237266466314188/)

1           19. Attached as Exhibit 18 is a true and correct copy of an October 1, 2020  
2 email, Bates Begin OLPX-SA-0000083568, attaching the No. 3 Product label, Bates  
3 Begin OLPX-SA-0000083586.

4           20. Attached as Exhibit 19 is a true and correct copy of a May 24, 2021  
5 email, Bates Begin OLPX-SA-0000079663.

6           21. Attached as Exhibit 20 is a true and correct copy of a July 21, 2021  
7 email, Bates Begin OLPX-SA-0000082217, attaching the No. 3 Product label, Bates  
8 Begin OLPX-SA-0000082225.

9           22. Attached as Exhibit 21 is a true and correct copy of a November 11,  
10 2021 email, Bates Begin OLPX-SA-0000408366, attaching Excel titled “11.11.21  
11 OLPX,” Bates Begin OLPX-SA-0000408368.

12           23. Attached as Exhibit 22 is a true and correct copy of the November 11,  
13 2021 DWAC Authorization letter from Olaplex to American Stock Transfer & Trust  
14 Company, LLC (“AST”), Bates Begin OLPX-SA-0000027871.

15           24. Attached as Exhibit 23 is a true and correct copy of an email chain from  
16 February 28, 2022 – March 1, 2022, Bates Begin OLPX-SA-0000127591.

17           25. Attached as Exhibit 24 is a true and correct copy of a list generated by  
18 AST of selling shareholders from October 1, 2021 through December 17, 2021, Bates  
19 Begin OLPX-SA-0000028221.

20           26. Attached as Exhibit 25 is a true and correct copy of DTC’s Participant  
21 Position Reports for Olaplex from October 2021 through November 2022, Bates  
22 Begin OLPX-SA-0000027878.

23           27. Attached as Exhibit 26 is a true and correct copy of an Equiniti Trust  
24 Company, LLC “INTERNAL CEDEFST REPORT” with information about shares  
25 from November 12, 2021 through April 22, 2025, Bates Begin OLPX-SA-  
26 0000028259.

